
**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

**IN RE:
Debtor.**

DR. SHABNAM QASIM, MD PA

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CASE # 18-43088-MXM-11

**SECOND APPLICATION FOR DISTRIBUTION OF
POST-PETITION RETAINER**

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Greer A. Smith (the "Applicant") and in support of his SECOND APPLICATION FOR DISTRIBUTION OF POST-PETITION RETAINER respectfully states:

**Factual and Procedural
Background**

1. This Chapter 11 case was filed August 2018. Since that date, the Debtor has continued as a debtor in possession pursuant to Sections 1107 and 1108 of the Code.
2. Greer A. Smith has been approved as Patient Care Ombudsman by Court order dated September 13, 2018.
3. No other Patient Care Ombudsman has been approved in this matter and all fees requested herein are for Greer A. Smith and Greer A. Smith has not shared or agreed to share fees with any other person or entity.

**Proposed Arrangement for
Compensation**

4. Greer A. Smith agreed to represent the Bankruptcy court in this case if Greer A. Smith will be compensated post-petition at his normal billing rate of \$125.00 per hour for the work performed and approved by this Court.
5. Greer A. Smith normal billing rate presently is \$125 per hour and he will have responsibility for this case. Applicant believes that Greer A. Smith billing rates are reasonable and are consistent and in-line with current fees for same type work.
6. Greer A. Smith has been a Patient Care Ombudsman for over 4 years; has handled a previous case; and, his hourly rate of \$75 per hour has previously been approved by this Court and the Bankruptcy Judge in the Northern and Eastern District of Texas
7. Greer A. Smith hourly rate has been \$125.00 per hour since 2015.
8. Greer A. Smith has received no payment from or for Debtor for this case or otherwise.

Professional Services Rendered

9. In the current billing period ending February 10, 2019, 2018 Greer A. Smith has generated a total invoice of \$2,028.63, which is inclusive of actual hourly work, phone calls, travel at ½ rate, copies and Pacer expenses. Greer A. Smith has visited the medical office of Dr. Shabnam Qasim, talked to employees, interviewed Dr. Shabnam Qasim, interview the office administrator of Dr. Qasim's office and made numerous phone calls to past employees and past and current patients from the Qasim law office

10. Greer A. Smith has the proven skills and training to perform the duty of Patient Care Ombudsman as demonstrated in prior assignments by the Northern and Eastern Districts of Texas cases.

11. A detailed billing statement and invoices or receipts for all expenses are attached. All expenses are billed at the invoice total without additions.

WHEREFORE, Applicant prays that this application for distribution of post-petition retainer be approved as an interim compensation under §331 of the Bankruptcy Code be approved and, if no objection is filed within 14 days of the service thereof, Debtor attorney, Craig Davis will withdraw the fee plus expenses from the retainer the amounts set forth as interim compensation and send by US MAIL to Greer A. Smith, without the necessity of a formal order as provided by local rules of Court.

DATED: February 15, 2019

Respectfully submitted,

/s/ Greer A. Smith

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PATIENT CARE OMBUDSMAN FOR
COURT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served electronically on all parties who have entered their appearance electronically in this case, and by first class mail on all parties listed on the attached matrix on November 05, 2018

/s/ greer a. smith
Greer A. Smith

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